

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

In Re:

George Dean Myers, Jr. &
Ermalinda Trejo Myers,

Debtor(s).

Case No. 17-21631-dob
Chapter 13 Bankruptcy

Hon. Daniel S. Opperman

DEBTORS' THIRD POST CONFIRMATION CHAPTER 13 PLAN MODIFICATION

George Dean Myers, Jr. & Ermalinda Trejo Myers (Debtor), by and through their counsel, Reinert & Reinert, by Joshua M. Reinert, propose the following post confirmation modification to the debtors' Chapter 13 Plan:

- 1) The debtors' Chapter 13 plan payment hereafter shall be \$380.77 per week.
- 2) Debtors propose the duration of the Chapter 13 plan shall be 84 months from the date of confirmation, October 16, 2017, pursuant to 11 U.S.C. Section 1329(d)(1).
- 3) Debtors propose that, upon court approval of this plan modification, any plan funding delinquency as a result of missed plan payments (if any) or failure to pay income tax refunds to the Trustee is forgiven.
- 4) All other terms of the confirmed plan and the October 16, 2017 Order Confirming Plan remain the same and are incorporated herein.
- 5) Debtors will not be filing Amended Schedules I & J because their income and expenses are nearly unchanged from when these Schedules were last filed.

Pursuant to LBR 3015-2(b)(1)(C) the impact of the proposed plan modification on each class of creditors is as follows:

- | | |
|-----------------|------|
| 1) Class One: | NONE |
| 2) Class Two: | NONE |
| 3) Class Three: | NONE |
| 4) Class Four: | NONE |

- 5) Class Five: NONE
- 6) Class Six: NONE
- 7) Class Seven: NONE
- 8) Class Eight: NONE
- 9) Class Nine: There may be a reduction of distribution to Class 9 Creditors.

Attached hereto are the following as required by LBR 3015-1(b) and 3015-2(b)(1)(B):

- 1) Liquidation Analysis (See Attachment 1);
- 2) Chapter 13 Worksheet (See Attachment 2).

Dated: August 18, 2021

Respectfully Submitted,

REINERT & REINERT

/s/ Joshua M. Reinert

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/s/ George Dean Myers, Jr.

George Dean Myers, Jr.

Debtor

George D. Myers

20 Aug 2021

/s/ Ermalinda Trejo Myers

Ermalinda Trejo Myers

Debtor

Ermalinda T. Myers 8/20/2021

ATTACHMENT 1

LIQUIDATION ANALYSIS AND STATEMENT OF VALUE OF ENCUMBERED PROPERTY

TYPE OF PROPERTY	FAIR MARKET VALUE	LIENS	DEBTOR'S SHARE OF EQUITY	EXEMPT AMOUNT	NON-EXEMPT AMOUNT
PERSONAL RESIDENCE	95,000.00	116,159.87	0.00	0.00	0.00
HHG/PERSONAL EFFECTS	1,990.00	0.00	1,990.00	1,990.00	0.00
CASH/BANK ACCOUNTS	914.30	0.00	914.30	914.30	0.00
VEHICLES	22,700.00	21,359.00	4,422.00	4,422.00	0.00

Amount available upon liquidation.....	\$	<u>0.00</u>
Less administrative expenses and costs.....	\$	<u>0.00</u>
Less priority claims.....	\$	<u>0.00</u>
Amount Available in Chapter 7.....	\$	<u>0.00</u>

ATTACHMENT 2 – CHAPTER 13 WORKSHEET

Name	Claimed Amount	Coll / Value	Interest Rate	Monthly Payment	To Be Paid
<u>Wells Fargo Bank NA</u>				\$874.00	\$33,212.00
<u>Wells Fargo Bank NA</u>	\$19,357.23	\$19,357.23			\$19,357.23
<u>Wells Fargo Bank NA</u>	\$1,931.97	\$1,931.97			\$1,931.97
<u>Joshua Reinert (P66185)</u>					\$1,500.00
<u>Credit Acceptance Corporation</u>	\$9,950.00	\$2,416.45	6.0000	\$192.36	\$2,501.91
All Unsecured Creditors	Total Unsecured		Percent Allowed		Amount Allowed
	\$46,855.35		0.9%		\$422.01

ATTACHMENT 2 – CHAPTER 13 WORKSHEET